

# Minnesota Pollution Control Agency

October 28, 1993

US EPA RECORDS CENTER REGION 5



466768

Mr. Keith H. Homstad  
Chairman of the Board  
B.B.D. Holdings, Inc.  
2010 East Hennepin Avenue  
Minneapolis, Minnesota 55413

Dear Mr. Homstad:

I am responding to your letter dated September 21, 1993, which was received by our Agency on October 5, 1993. In your letter you asked about the possibility for re-evaluating the status of the General Mills Site, 2010 East Hennepin Avenue, Minneapolis, with a view to having the Site delisted from the National Priority List (NPL).

Specifically, you asked for a response to the following questions:

- 1) What procedure is necessary to change the status of this site in light of this demonstrated improvement over the past seven years?

Response: Enclosed please find a copy of procedures required to delist a site from the NPL. As indicated in correspondence dated September 14, 1993, from Tom Alcamo, U.S. Environmental Protection Agency (EPA) Region 5, to Mr. William Taylor, General Mills: "The General Mills/Henkel ground water pump and treatment system has not achieved the cleanup levels described in the Consent Order with the Minnesota Pollution Control Agency (MPCA) or levels acceptable to the United States Environmental Protection Agency (U.S. EPA). Therefore, delisting the General Mills/Henkel site from the NPL is not possible at this time. The site is in the long-term response (LTR) and is now part of the construction completion category on the NPL." Basically, before the site can be delisted, General Mills must demonstrate that the cleanup levels required in the Consent Order have been achieved and the EPA must agree that those cleanup levels are acceptable.

- 2) Who makes this decision to change the status?

Response: When the site is ready to be delisted, The Minnesota Pollution Control Agency (MPCA) will make the appropriate recommendation to the EPA and the EPA makes the final decision regarding delisting the site. For your information, a Five Year Review is scheduled for the site to take place during the summer of 1994 to determine if the existing site remedy is still protective of human health and the environment. The EPA will take the lead on the review. Part of the review will determine the progress that has been made to that time in achieving the site cleanup and any further work that may be necessary at the site.

Printed on recycled paper containing at least 15% fiber from paper recycled by consumers.

MPCA Toll Free 1-800-657-3864, Telephone Device for the Deaf (TDD) (612) 297-5353, Greater Minnesota TDD 1-800-627-3529

520 Lafayette Rd.; St. Paul, MN 55155-4194; (612) 296-6300; Regional Offices: Duluth • Brainerd • Detroit Lakes • Marshall • Rochester

Equal Opportunity Employer • Printed on Recycled Paper

Mr. Keith H. Homstad

Page 2

October 28, 1993

3) What can we do to assist the process?

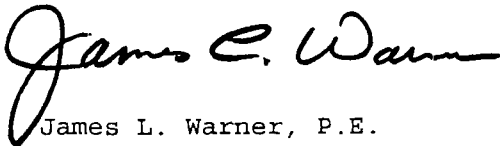
Avoid any actions that contribute to the known release or that interfere with the response actions required under any response action plan approved by the MPCA to address the known release.

4) How long will it take?

The site can be delisted when all response actions (including operation and maintenance) required at the site have been completed and MPCA and EPA determine that the site no longer poses a threat to public health or welfare or the environment. Ground water treatment takes a long time and, based on current monitoring data, it does not appear that the cleanup levels will be met in the near future. The outcome of the five year review will determine the status of the site.

If there are questions or you require additional information, please contact Dagnar Romano of my staff at (612) 296-7776.

Sincerely,

A handwritten signature in black ink, reading "James L. Warner". The signature is written in a cursive, flowing style.

James L. Warner, P.E.  
Division Manager  
Ground Water and Solid Waste Division

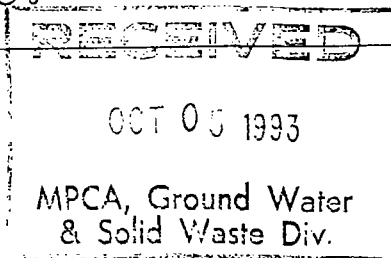
JLW:pk

Enclosure

cc: Tom Alcamo, U.S. Environmental Protection Agency, Region 5

# B.B.D. HOLDINGS INC.

Mr. Jim Warner, Division Manager  
Ground Water-Solid Waste Division  
Minnesota Pollution Control Agency  
520 LaFayette Road  
St. Paul, MN 55155-3898



MULTI BUSINESS CENTER  
2010 EAST HENNEPIN AVENUE  
MINNEAPOLIS, MINNESOTA 55413  
612-378-1144 FAX 612-378-2319

Dear Mr. Warner,

21 Sept 1993

We are a family owned multi-business center located on the site of the original General Mills Research Labs - a Super Fund site. We purchased the property from Henkel corporation in 1990. It had been abandoned and vacant for almost 4 years at that point. After considerable renovation there are now over 80 businesses located here employing about 200 people.

We write because of a concern of our tenants, i.e. **"Since this site is being cleaned by General Mills, WHEN will it be removed from the Super Fund list?"** A number of our tenants have been grossly discriminated against when purchasing business insurance. They have been rebuffed with the excuse, "You are on a Super Fund site and we can't write insurance for anybody who is on such a site." That is a blatant falsehood that seems to us to be an excuse for insurance underwriters to escape doing their homework - or to demand extortionist premiums!

Be that as it may, maybe the whole discrimination problem can be stopped once and for all by having the status of the site revaluated and changed. The M.P.C.A. has received an annual report from General Mills every year since 1985-86 concerning the status of the ground water contamination of this property. Those reports clearly show that the problem is being resolved, and resolved quite nicely it seems to us. In fact, the latest report for 1992 recommends that reports are needed only every two years from now on.

Our questions to you are:

1. **WHAT procedure is necessary to change the status of this site in light of this demonstrated improvement over the past seven years?**
2. **WHO will make this decision to change the status?**
3. **WHAT can we do to assist the process?**
4. **HOW long will this take?**

Mr. Warner, some of these businesses located here are doing really exciting things in pollution control. I am especially thinking of RECYCLIGHTS, INC. (you may be familiar with them), who is very successful in removing mercury from used fluorescent lights, and street lights, so it doesn't enter ground water from land fill sites. It is ironic and grossly unjust that they, and others, should be stigmatized by the words "Super Fund", when they and General Mills are doing an exemplary job in cleaning and protecting the environment!

Please direct your attention to ~~the~~ <sup>this</sup> matter. It is very important to all of us. Thank you.

Sincerely,

Keith E. Homstad, Chairman of the Board